

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

IRONBURG INVENTIONS LTD.,

Plaintiff,

v.

VALVE CORPORATION,

Defendant.

No. 2:17-cv-01182-TSZ

**PLAINTIFF IRONBURG INVENTIONS  
LTD.'S RESPONSE TO COURT'S ORDER  
RE: MAILING OF ACCUSED DEVICES**

Pursuant to the Court's Minute Order dated January 19, 2021 (Dkt. #388), plaintiff Ironburg Inventions Ltd. ("Ironburg") hereby submits its response to the Court's order that "Defendant is directed to provide to the Court, in advance of trial, ten (10) accused devices. Any objections to the Court's plan of mailing an accused device to each juror, instructing jurors not to open the boxes or inspect the devices until told to do so, and attempting to retrieve the devices after the trial are due by January 20, 2021." Ironburg does not object to the Court's plan to mail the accused controllers to the jurors, as outlined in the Minute Order, provided that:

- The Court instructs the jurors to refrain from opening the packages containing the accused devices before jury deliberations commence; and
- An attorney or representative for Ironburg has, prior to the jurors opening the boxes, an opportunity to view the devices provided by defendant Valve Corporation via Zoom to ensure all parties agree the correct devices are sent to and received by the jurors.

Ironburg respectfully submits these requests in an attempt to mirror the procedure for physical evidence that would likely be employed for an in-person jury trial.

Dated: January 20, 2021

**MANATT, PHELPS & PHILLIPS, LLP**

By: /s/ Robert D. Becker  
 Robert D. Becker, *pro hac vice*  
 Christopher L. Wanger, *pro hac vice*  
 One Embarcadero Center, 30th Floor  
 San Francisco, CA 94111  
 Tel: (415) 291-7617; Fax (415) 291-7474  
 Email: [rbecker@manatt.com](mailto:rbecker@manatt.com)  
 Email: [cwanger@manatt.com](mailto:cwanger@manatt.com)

**SAVITT BRUCE & WILLEY LLP**

Stephen C. Willey, WSBA #24499  
 1425 Fourth Avenue, Suite 800  
 Seattle, WA 98101-2272  
 Tel: (206) 749-0500; Fax (206) 749-0600  
 Email: [swilley@sbwillp.com](mailto:swilley@sbwillp.com)

*Attorneys for Plaintiff Ironburg Inventions Ltd.*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 20, 2021 I served the foregoing PLAINTIFF IRONBURG INVENTIONS LTD.'S RESPONSE TO COURT'S ORDER RE: MAILING OF ACCUSED DEVICES with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the attorneys of record.

/s/ Robert D. Becker  
Robert D. Becker